

March 22, 2024

VIA ECF

Hon. Ronnie Abrams, United States District Court Judge
United States District Court, Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, NY 10007

RE: Doheny, et al. v. Kyndryl Holdings, Inc. et al.,
Civ. A. No. 1:23-cv-03962-RA-SN

Dear Judge Abrams:

Plaintiffs and Defendant Kyndryl Holdings, Inc. write jointly to request a stay of this matter to facilitate a private mediation. The Plaintiffs and Kyndryl have agreed to mediate before experienced employment law mediator Dina R. Jansenson. Ms. Jansenson currently has availability to mediate on July 18, 2024, Plaintiffs and Kyndryl have agreed to mediate sooner than that if she gets openings based on cancellations. Defendant IBM does not oppose this stay request.

Currently, Plaintiffs' amended complaint is due on March 25, 2024, and a revised motion or the issuance of notice is due on April 8, 2024. See Order, Dkt. 62. Plaintiffs and Kyndryl request that these deadlines be stayed, and that the Court order the parties to submit a status report within seven (7) days following the mediation.

Respectfully submitted,

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan
Counsel for Plaintiffs

/s/ Brian D. Berry
Counsel for Defendant Kyndryl
Holdings, Inc.

cc: All counsel of record via CM/ECF